

Exhibit 6

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY

3 *****

4 IN RE: VALSARTAN, LOSARTAN, MDL No. 2875
5 AND IRBESARTAN PRODUCTS

6 LIABILITY LITIGATION HON ROBERT B.
7 KUGLER

8 *****

9 THIS DOCUMENT APPLIES TO ALL
10 CASES

11

12 *****

13

14 - CONFIDENTIAL INFORMATION -
15 SUBJECT TO PROTECTIVE ORDER

16

17 Remote Videotaped via Zoom
18 Deposition of PENG DONG, commencing at 7:07
19 a.m. Hong Kong time, on the 29th of March,
20 2021, before Maureen O'Connor Pollard,
21 Registered Diplomat Reporter, Realtime
22 Systems Administrator, Certified Shorthand
23 Reporter.

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1 (Whereupon, a recess was
2 taken.)

3 THE VIDEOGRAPHER: The time is
4 8:24 a.m. Back on the record.

5 (Whereupon, Exhibit Number
6 ZHP-193 was marked for
7 identification.)

8 BY MR. SLATER:

9 Q. Do you see this exhibit in
10 front of you titled "Guideline for Genotoxic
11 Impurity Evaluation"?

12 A. I see it.

13 Q. Look at Section 2, please.
14 This states in part, "All intermediates and
15 APIs produced under GMP conditions must be
16 identified for genotoxic impurities."

17 Do you see that?

18 A. I see it. The document does
19 state so.

20 Q. Identification of genotoxic
21 impurities is part of the risk assessment
22 evaluation, correct?

23 A. Per the requirements of ICH, we
24 would confirm the quality specifications of

1 API.

2 Q. This applies to valsartan,
3 correct?

4 Let me reask the question.
5 Hang on. Let me reask the question.

6 What you just stated would
7 apply to valsartan, correct?

8 A. For API products, including
9 valsartan API, we would confirm the quality
10 specifications per the requirements of ICH.

11 Q. Part of evaluating -- rephrase.
12 Part of this process includes
13 identifying all genotoxic impurities,
14 correct?

15 A. What do you mean by "part of
16 this process"?

17 Q. The GMP process to ensure the
18 product meets quality requirements.

19 A. Can you repeat your question by
20 putting what you just said? I'm sorry.

21 Q. No.

22 Let's go to Section 4.2.1. In
23 part, this says, "Sources of genotoxic
24 substances include raw materials, reagents,

1 solvents, intermediates, and by-products,"
2 correct?

3 A. The document does say so in
4 Chinese.

5 Q. And your company knew that from
6 the time it began to manufacture valsartan,
7 correct?

8 A. I believe this document should
9 have an effective date. I'm sorry, I missed
10 the effective date.

11 Q. My question --

12 MR. SLATER: Move to strike.

13 Q. What I just read in 4.2.1 your
14 company has known from the first day it ever
15 manufactured valsartan, correct?

16 A. I need to know the effective
17 date of this document.

18 Q. Do you know if your company
19 knew the sources of genotoxic substances when
20 it first started manufacturing valsartan?
21 Yes or no.

22 A. We conducted our work based on
23 the requirements of ICH as well as the
24 regulations of our internal SOPs.

1 As for those ICH requirements
2 and SOPs, they had certain effective period
3 of time, and that would start with an
4 effective date.

5 MR. SLATER: Move to strike.

6 Q. It's a very simple question.
7 The information I read to you in
8 Section 4.2.1, did ZHP know the sources of
9 the genotoxic substances when it first
10 started manufacturing valsartan? Yes or no.
11 Did it know that list or not?

12 A. Section 4.2.1 is indeed
13 included in this document. However, I need
14 to know the effective date of this document.

15 In addition, we conducted our
16 work in developing the manufacturing process
17 of valsartan based on the requirements of ICH
18 then, as well as the internal SOP regulations
19 then.

20 MR. SLATER: Move to strike.

21 Q. I'm going to ask you a question
22 not referring to this document to try to get
23 you to answer responsively.

24 From the time ZHP began to

1 manufacture valsartan, did it know that the
2 sources of genotoxic substances included raw
3 materials, reagents, solvents, intermediates,
4 and by-products? Yes or no.

5 A. When ZHP first started to
6 manufacture valsartan, they conducted the
7 work based on the requirement of ICH then, as
8 well as the regulations of the internal SOP
9 then.

10 When I mentioned ICH and SOP, I
11 was referring to the documents then.

12 MR. SLATER: Move to strike.

13 Q. Can you just answer with a yes
14 or no, please, the actual question I asked?

15 A. What was your original question
16 again?

17 MR. SLATER: Go off the record.

18 THE VIDEOGRAPHER: All right.

19 The time is 8:40 a.m. Off the record.

20 (Off the record discussion.)

21 THE VIDEOGRAPHER: The time is
22 8:41 a.m. Back on the record.

23 BY MR. SLATER:

24 Q. I am told that this document

1 was created in 2011.

2 MR. BALL: Objection to form.

3 MR. SLATER: What's the
4 objection?

5 MR. BALL: Foundation. You
6 were told, Adam?

7 MR. SLATER: You're really
8 having a fun time over there, Rick,
9 aren't you?

10 MR. BALL: You know, Adam, I'm
11 going to make my objections. You
12 asked me what my objection was, and I
13 just told you.

14 MR. SLATER: I hadn't even
15 finished my sentence, but --

16 MR. BALL: Okay.

17 MR. SLATER: -- keep having a
18 grand time over there. It's fine.

19 BY MR. SLATER:

20 Q. I'm told that the metadata for
21 this document shows that it was created in
22 2011. Do you know whether that's correct or
23 not?

24 MR. BALL: Objection to form.

1 A. Can you show me the time? I
2 cannot find that time in this document.

3 BY MR. SLATER:

4 Q. I asked you if you know.
5 Either the answer is yes or no.

6 MR. BALL: Objection to form.

7 A. Judging from what is shown to
8 me on the screen, it is impossible for me to
9 tell when this document was created, nor
10 could I tell that -- what the effective date
11 of this document is.

12 BY MR. SLATER:

13 Q. Have you ever seen this
14 document --

15 MR. SLATER: Move to strike.

16 Q. Have you ever seen this
17 document --

18 MR. BALL: Oppose the motion.

19 MR. SLATER: I'm going to start
20 over.

21 BY MR. SLATER:

22 Q. Have you ever seen this
23 document before?

24 A. When you said have I seen this

1 document before, what time frame are you
2 referring to?

3 Q. Ever in your life before today.

4 A. To the best of my recollection,
5 I have seen this document before. It seems
6 so.

7 Q. Have you ever used this
8 document in your work?

9 A. In the course of my employment,
10 we conducted our work based on the
11 requirements of ICH and SOP then.

12 MR. SLATER: Move to strike.

13 MR. BALL: Oppose the motion.

14 BY MR. SLATER:

15 Q. Mr. Dong, did I ask you about
16 ICH? No, I didn't.

17 Did I ask you about any other
18 SOPs? No, I didn't.

19 I would appreciate, like I
20 asked you up front, to be courteous and
21 comply with your obligations under the United
22 States Federal Rules of Civil Procedure and
23 answer the questions I actually ask you. I
24 would really appreciate that. It would make

1 things go a lot smoother for everybody.

2 MR. BALL: Objection to form.

3 I don't even know if that was a
4 question.

5 MR. SLATER: No. It was a
6 request for the witness to actually
7 make some minimal effort to be
8 responsive.

9 MR. BALL: Objection.
10 Harassment.

11 Go ahead and translate it.

12 A. I will tell you the truth.

13 BY MR. SLATER:

14 Q. Look at Section 4.2.3. It says
15 in part, "After product pilot, genotoxic
16 impurities should be preliminarily determined
17 and included in the development report."
18 Correct?

19 MR. BALL: Objection to form.

20 A. According to this document, it
21 says in this section, "After the research and
22 development of the product pilot, genotoxic
23 impurities should be preliminarily determined
24 and included in the development report."

1 That's what it says in Chinese.

2 BY MR. SLATER:

3 Q. Look at 4.2.4. That says, "The
4 identification of genotoxic impurities should
5 include confirmed structure of genotoxic
6 impurities and confirm analysis method and
7 residual limit of the impurity." Correct?

8 MR. BALL: Objection to form.

9 A. According to this document, the
10 Chinese statement does say so in
11 Section 4.2.4.

12 BY MR. SLATER:

13 Q. Let's go to Section 4.3.1.
14 This section says, "The technical department
15 organizes relevant departments to evaluate
16 all raw materials, reagents, solvents,
17 intermediates, and by-products of the product
18 and evaluate whether they contain genotoxic
19 substances." Correct?

20 MR. BALL: Objection to form.

21 A. In Section 4.3.1 of this
22 document, the Chinese version says, "The
23 technical department should organize relevant
24 departments to evaluate all raw materials,

1 reagents, solvents, intermediates, and
2 by-products of the product, and evaluate
3 whether there are any genotoxic substances in
4 them." That's what the Chinese says.

5 BY MR. SLATER:

6 Q. The technical department is the
7 department that you work in, correct?

8 MR. BALL: Objection to form.

9 A. Do you mean the technical
10 department described in this document when
11 you say "technical department"?

12 BY MR. SLATER:

13 Q. Is the technical department
14 referenced in 4.3.1 the department you work
15 in?

16 MR. BALL: Objection to form.

17 A. The technical departments
18 referred in this document under Section 4.3.1
19 refer to all the technical departments in
20 ZHP's facilities. My department is only one
21 of them.

22 BY MR. SLATER:

23 Q. This instruction to the
24 technical departments would also apply to

1 your technical department, the one you work
2 in, correct?

3 MR. BALL: Objection to form.

4 BY MR. SLATER:

5 Q. Let me stop. Let me stop. Let
6 me withdraw the question.

7 There's a technical department
8 for the Chuannan facility where the valsartan
9 API was manufactured, correct?

10 MR. BALL: Objection to form.

11 A. There is a technical department
12 at the Chuannan facility of ZHP.

13 BY MR. SLATER:

14 Q. This guideline applies to that
15 technical department, correct?

16 MR. BALL: Objection to form.

17 A. Are you referring to this SOP
18 by "this guideline"?

19 BY MR. SLATER:

20 Q. Yes.

21 A. Can you repeat the pending
22 question? I'm sorry.

23 Q. This guideline that is on the
24 screen applies to the technical department in

1 Chuannan, correct?

2 MR. BALL: Objection -- sorry.

3 Objection to form.

4 A. The technical department in
5 Chuannan should conduct their work based on
6 the current SOP.

7 BY MR. SLATER:

8 Q. When Section 4.3.1 refers to
9 the "technical departments" plural, that
10 includes the technical department at
11 Chuannan, correct?

12 MR. BALL: Objection to form.

13 A. After this SOP became
14 effective, all the technical departments
15 referred to under Section 4.1 point --

16 THE INTERPRETER: The
17 interpreter's correction.

18 A. -- under Section 4.3.1,
19 including the technical department in
20 Chuannan, need to conduct their work based on
21 the effective SOP at that time.

22 BY MR. SLATER:

23 Q. Look at 4.4.1. The first part
24 says, "Genotoxic substances are potentially

1 destructive to DNA at any intake level, and
2 this damage may lead to tumors." Correct?

3 It says that in part, correct?

4 MR. BALL: Objection to form.

5 A. One sentence under
6 Section 4.4.1 of this document does say that
7 "Genotoxic substances are potentially
8 destructive to DNA at any intake level, and
9 this damage may lead to tumors."

10 This sentence is only within
11 this paragraph under Section 4.4.1.

12 BY MR. SLATER:

13 Q. Go to Section 4.4.11. This
14 indicates that "Genotoxic impurities and
15 their residual limits as found by the company
16 are found in Appendix A." Correct?

17 MR. BALL: Objection to form.

18 A. In this document under
19 Section 4.4.11, the sentence in Chinese does
20 say, "The genotoxic impurities and their
21 residual limits as determined by the company
22 are found in Appendix A."

23 In addition, could you please
24 scroll up this document a little bit? It

1 makes me feel tired when I have to look down
2 at this paragraph. I'm sorry.

3 MR. SLATER: I don't
4 understand. Move to strike the last
5 part.

6 MR. BALL: Oppose the motion.

7 BY MR. SLATER:

8 Q. Mr. Dong, if you look in the
9 top left, it says number "API-R&D-002."

10 Do you see that?

11 MR. BALL: Objection to form.

12 A. As shown on the screen, on this
13 document at the upper left corner, there is
14 indeed a number "API-R&D-002."

15 BY MR. SLATER:

16 Q. By -- rephrase.

17 Since it says "002," this is
18 version 2 of this guideline, correct?

19 MR. BALL: Objection to form.

20 A. This is a document number.

21 BY MR. SLATER:

22 Q. That's your answer?

23 MR. BALL: Objection to form.

24 A. I'm sorry. I don't understand

1 your question. Are you asking me whether I'm
2 done with responding to the previous
3 question?

4 BY MR. SLATER:

5 Q. Because it says "002," that
6 means it's the second version. You know how
7 your documents are written in your company,
8 right?

9 MR. BALL: Objection to form.
10 Harassment.

11 A. I need to review the whole
12 document before responding to the opposing
13 counsel's question.

14 BY MR. SLATER:

15 Q. We can go off the record if you
16 want to read the whole document.

17 MR. BALL: No, we won't. He
18 can read it on the record. He will
19 take the time, your time, to do that.

20 MR. SLATER: I'm sorry, but
21 we're not going to. I'm not going to
22 sit while he reads the whole document.
23 I don't know what he's reading for.
24 The date of the document is not on it,

1 so I don't know what he's looking for.

2 MR. BALL: Well, then, I don't
3 know what he's looking for either.

4 Why don't you ask him. But we're not
5 going off the record.

6 MR. SLATER: This isn't how
7 we're going to do this.

8 MR. BALL: We're not going off
9 the record.

10 MR. SLATER: I've got a
11 different way of asking it, Mr. Ball.

12 BY MR. SLATER:

13 Q. Mr. Dong, do you know if this
14 is the only version of this document or not?
15 Yes or no. It's a simple yes-or-no question.

16 MR. BALL: Objection to form.

17 A. In order to provide an accurate
18 answer, I need to review the whole document.

19 BY MR. SLATER:

20 Q. Okay. Well, you can do that on
21 your own time.

22 MR. SLATER: Let's go to
23 Appendix A. Perfect.

24 Q. This is Appendix A, correct?

1 MR. BALL: Objection to form.

2 A. It says here after "Attachment
3 A," "List of genotoxic impurities by ZHP."
4 That's what it says.

5 BY MR. SLATER:

6 Q. In line 7, line 9, and line 10,
7 the product in the right-hand column is
8 valsartan, correct?

9 MR. BALL: Objection to form.

10 A. In line 7, line 9, and line 10
11 of this document, in the right-hand column,
12 the product in Chinese is valsartan.

13 BY MR. SLATER:

14 Q. The left-hand column is the
15 list of impurities.

16 Do you see that?

17 MR. BALL: Objection to form.

18 MR. SLATER: What's your
19 objection, Counsel?

20 MR. BALL: My objection is, why
21 don't you -- never mind. I don't --
22 my objection is that's vague, first
23 off.

24 MR. SLATER: Are you just

1 objecting to form to --

2 MR. BALL: You haven't laid a
3 foundation. You haven't laid a
4 foundation.

5 MR. SLATER: Okay. I think
6 you're objecting to form every time
7 you can't read the language, just
8 to -- just for the heck of it. I
9 mean --

10 MR. BALL: As far as I know,
11 Adam, you don't read Chinese.

12 MR. SLATER: No, I don't.

13 MR. BALL: So I'm not relying
14 on your translation of it.

15 MR. SLATER: Okay. So you're
16 objecting to the form in case the
17 translation is wrong?

18 MR. BALL: I'm objecting to
19 the -- I'm objecting that you did not
20 lay a foundation for what the
21 left-hand column says.

22 MR. SLATER: Okay. That's what
23 that question was, actually.

24 MR. BALL: No, it wasn't. It

1 was "The left-hand column
2 says...correct?" Which is you
3 translating the left-hand column and
4 asking my witness if that's what it
5 says.

6 MR. SLATER: Yes. Right. And
7 then if it's -- and then -- all right.
8 And then if he's -- all right.
9 Whatever. You know what? Nice.
10 Good.

11 BY MR. SLATER:

12 Q. The left-hand column, the title
13 is "List of impurities," correct?

14 MR. BALL: Objection to form.

15 A. In this list, the second column
16 at the top says in Chinese "Names of the
17 impurities of genotoxicity." That's what it
18 says in Chinese.

19 BY MR. SLATER:

20 Q. Next to number 7 in that
21 column, it says "azide," correct?

22 MR. BALL: Objection to form.

23 BY MR. SLATER:

24 Q. I'll ask it differently.

1 How about we'll do it this way.

2 On line 7 in the impurities column that you
3 just read the title for, what is the impurity
4 that's listed there?

5 A. In this table under the second
6 column in line 7, it says "azide" here.

7 Q. What does it say in line 9 in
8 that column for valsartan?

9 A. What do you mean by "line 9 in
10 that column for valsartan"? Are you asking
11 me to read aloud the content of the whole
12 line 9?

13 Q. In the column that's titled
14 "Names of the impurities," next to the number
15 9, what does it say for the impurity?

16 A. In the table as shown on the
17 screen, under column 2 in line 9, it says
18 "Bromo OBTN."

19 Q. What does it say directly
20 beneath that on line 10 in that column?

21 A. In the table shown on the
22 screen, under column 2 in line 10, it says
23 "Bromo OBTN tetrazole."

24 Q. Let's go to the prior page.

1 Looking at the top of this
2 page, does this tell you whether this is the
3 first version of this guideline or not?

4 A. According to what's shown on
5 the screen, it says here in Chinese, "This
6 document is a new document." Based on that,
7 I can determine that this document is a first
8 version.

9 MR. BALL: I didn't hear what
10 you said. You "can determine" or you
11 "can't determine"?

12 I'm asking the translator what
13 he said.

14 THE INTERPRETER: The
15 interpreter would repeat.

16 A. I can, C-A-N, determine this is
17 a first version.

18 BY MR. SLATER:

19 Q. To your recollection, has --
20 we'll rephrase.

21 When the process change
22 occurred to include zinc chloride in the
23 process, was this guideline applied by ZHP?

24 A. I'm sorry. Since I did not see

1 the effective date of this document, I cannot
2 provide an accurate response to your
3 question.

4 Q. I can scroll -- rephrase.

5 There is no effective date on
6 the document. Not written on it.

7 MR. BALL: Objection to form.

8 I don't know if there's a question.

9 BY MR. SLATER:

10 Q. Here's the question. You --
11 we'll rephrase.

12 Was this guideline applied to
13 the zinc chloride process change for
14 valsartan? Yes or no.

15 MR. BALL: Objection to form.

16 A. During the process change for
17 valsartan, we conducted our work based on the
18 ICH and SOP requirements at that time.

19 MR. SLATER: Move to strike.

20 BY MR. SLATER:

21 Q. Is the answer yes?

22 MR. BALL: Oppose the motion.

23 MR. SLATER: Move to strike.

24 ///

1 BY MR. SLATER:

2 Q. Is the answer --

3 MR. BALL: Oppose the motion.

4 MR. SLATER: I'm just saying it
5 because you talked over me.

6 BY MR. SLATER:

7 Q. Is the answer yes or no?

8 Please answer.

9 MR. BALL: Objection to form.

10 A. Could you repeat the question?

11 BY MR. SLATER:

12 Q. How did I know you were going
13 to ask me that? I'll try it for the third
14 time.

15 Was this guideline applied and
16 used when the process change to the zinc
17 chloride process for valsartan was made?

18 MR. BALL: Objection to form.

19 BY MR. SLATER:

20 Q. Yes or no.

21 MR. BALL: Objection to form.

22 A. During the process change for
23 valsartan, we conducted corresponding work
24 based on the requirements of ICH then, as

1 well as the requirements of the SOP at that
2 time.

3 MR. SLATER: Move to strike.

4 MR. BALL: Oppose the motion.

5 MR. SLATER: Mr. Ball, he
6 hasn't answered the question.

7 MR. BALL: I believe he has, at
8 least six or seven times.

9 MR. SLATER: Tell me what I'm
10 missing about the -- is the answer yes
11 or no, then? Was this actually
12 utilized with the process change?
13 Because I can't figure it out from his
14 answer.

15 Would you tell me what that
16 answer is?

17 MR. BALL: Are you asking me or
18 are you asking the witness?

19 MR. SLATER: I'm asking you,
20 because you keep saying his answer is
21 responsive. So tell me whether or not
22 the answer was yes or no.

23 MR. BALL: I'm not going to --
24 I'm not here to answer questions,

1 Adam. I'm sorry you don't like the
2 answer you're getting from the
3 witness.

4 MR. SLATER: I don't not like
5 the answer. He won't answer the
6 question.

7 MR. BALL: Adam, I'm sorry you
8 don't like the answer. Again, you can
9 take it up with the Court.

10 MR. SLATER: Is that what you
11 want me to do?

12 MR. BALL: I want you to -- I
13 don't want you to keep asking that
14 same question over and over again
15 because you don't like the answer
16 you're given.

17 MR. SLATER: It's not that I
18 don't like it. It's that he won't
19 answer the question, and I can't
20 understand what he's saying. He's not
21 addressing what I'm asking.

22 I mean, I think there's some
23 obligation by a lawyer to tell their
24 client to be responsive in a federal

1 proceeding.

2 MR. BALL: Adam, I believe he
3 is being responsive. He's answering
4 the question to the best of his
5 ability.

6 MR. SLATER: Really?

7 MR. BALL: Yes.

8 MR. SLATER: Okay. We'll try
9 it one last time, and then we'll have
10 our nice record.

11 BY MR. SLATER:

12 Q. Mr. Dong, was this guideline
13 utilized as part of the evaluation of
14 potential genotoxic impurities for the zinc
15 chloride process change? Yes or no.

16 And I'm asking you to either
17 say yes or no.

18 MR. BALL: Objection.

19 You don't get to tell the
20 witness how to answer a question,
21 Adam.

22 Objection to form.

23 A. Your question is quite long. I
24 just heard from the interpreter that this

1 guideline is part of the SOP. I want to find
2 out, which part are you referring to?

3 MR. SLATER: Mr. Interpreter, I
4 don't understand that. He's now
5 saying that he doesn't understand your
6 interpretation, and he's asking me to
7 fix your interpretation?

8 What's going on here? I mean,
9 is that what he actually just said?

10 A. Your question was translated by
11 the interpreter, but it was very long.
12 Through the interpreter, I heard that you
13 referred to this guideline as part of the
14 SOP, so I just wonder, which part of the SOP
15 are you referring to?

16 MR. SLATER: Move to strike all
17 this nonresponsive evasion.

18 MR. BALL: Oppose the motion.

19 BY MR. SLATER:

20 Q. Was this guideline utilized in
21 connection with the zinc chloride process
22 change? Yes or no.

23 MR. BALL: Objection to form.

24 A. During the zinc chloride

1 process change, we conducted the
2 corresponding work based on the requirements
3 of ICH at that time, as well as the
4 requirements of the SOP at that time.

5 BY MR. SLATER:

6 Q. Was this guideline one of those
7 SOPs that was utilized?

8 A. Judging from what is shown on
9 the screen, I cannot tell the effective date
10 of this SOP. I need to review the whole
11 document in order to understand this SOP.

12 MR. SLATER: Let's go off the
13 record. I think it's time for a
14 break, right?

15 MR. BALL: It is time for a
16 break.

17 THE VIDEOGRAPHER: The time is
18 9:35 a.m. Off the record.

19 (Whereupon, a recess was
20 taken.)

21 THE VIDEOGRAPHER: The time is
22 9:49 a.m. Back on the record.

23 BY MR. SLATER:

24 Q. The metadata for this document

1 says it was modified on June 17, 2011. I'm
2 just telling you what the metadata says
3 provided by your lawyer.

4 Knowing that and looking at the
5 document, you can look at it and tell me
6 whether or not this guideline was applied to
7 the zinc chloride process change for
8 valsartan.

9 MR. BALL: Objection to form.

10 A. Judging from what has been
11 shown on the screen, I cannot give you an
12 accurate answer.

13 As for the process change for
14 valsartan, we conducted the corresponding
15 work based on the requirements of ICH then
16 and the requirements of SOP then.

17 MR. SLATER: Move to strike
18 from "as for" forward.

19 MR. BALL: Oppose the motion.

20 BY MR. SLATER:

21 Q. What do you need to see in
22 order to answer the question?

23 A. What is your question?

24 MR. SLATER: I'm going to take

1 that as the witness has been asked
2 enough times, he's going to refuse to
3 answer and/or he's unprepared as a
4 30(b)(6).

5 We're going to move to the next
6 document, and that's how we're going
7 to conduct ourselves today.

8 MR. BALL: Objection.

9 MR. SLATER: Take the document
10 down. We've made a full record on
11 that issue with that document. I
12 think that's sufficient to establish
13 what's going on here.

14 Now, what we're going to do
15 next is pull up -- I'm going to be
16 working with two documents. We have
17 an English version and we have a
18 Chinese version, both of which were
19 provided by ZHP. I'm letting counsel
20 know so they know what's going on.

21 So I'm going to put on the
22 screen -- what's the next exhibit?
23 193 or 194?

24 I'm asking the court reporter,